

## **Exhibit 1**

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN**

AFT MICHIGAN,

Case No. 17-cv-13292

Plaintiff,

v.

Hon. Linda V. Parker

PROJECT VERITAS and  
MARISA L. JORGE.

Magistrate Judge Elizabeth A. Stafford

Defendants.

**DEFENDANT PROJECT VERITAS'S RESPONSES TO  
PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS**

NOW COMES Defendant Project Veritas, by and through its attorneys, and for its Objections and Responses to Plaintiff AFT-Michigan's First Requests for Production of Documents states as follows:

**GENERAL OBJECTIONS**

1. Project Veritas objects to Instruction #3 under Fed. R. Civ. P. 26 because assembling "a descriptive list" of any requested documents or items that it declines to produce and the grounds on which they are not being produced would be overly burdensome and far out of proportion to the needs of the case. Given the vagueness and overbreadth of many of the requests for production, compiling such a list would be nearly impossible. Subject to this and its specific objections, Project Veritas will provide a list of responsive documents that are withheld for privilege or

lawsuit.

5. Produce all minutes of meetings of the Board of Directors of Project Veritas taking place during 2016, 2017, and 2018.

**RESPONSE:**

Project Veritas objects to this request because it seeks information that is not relevant to any party's claims or defenses, is not reasonably calculated to lead to the discovery of relevant evidence, is intended to harass, and calls for privileged, confidential information. To the extent such documents exist, Project Veritas will produce at a date and time agreed upon by counsel any responsive, non-privileged documents from the years 2016, 2017, and 2018 that discuss the investigation of AFT-Michigan. If any such documents contain the names of Project Veritas journalists who played no role in the investigation of AFT Michigan, details of other investigations, or donor information, that information will be redacted as irrelevant to any party's claims or defenses and privileged under the First Amendment.

6. Produce all copies of the IRS Forms 990 filed by Project Veritas for the years 2015 and 2016, 2017 and 2018 when filed.

**RESPONSE:**

**Project Veritas objects to this request because it seeks information that is not relevant to any party's claims or defenses, is not reasonably calculated to lead to the discovery of relevant evidence, is not in proportion to the needs of the case, is intended to harass, and calls for privileged, confidential information. Subject to the foregoing objections, Project Veritas will produce all copies of IRS Forms 990 filed for the years 2015 through 2017, redacting all names of donors listed on Schedule B, at a date and time to be agreed upon by counsel.**

7. Provide a copy of form W-2 or form 1099 issued by Defendant Project Veritas for Marisa Jorge for calendar year 2016, 2017 and 2018.

**RESPONSE:**

**Project Veritas will produce any W-2 or Form 1099 for Marisa Jorge for the year 2017, which is the only year relevant to the instant lawsuit. Otherwise, Project Veritas objects to the remainder of the request as irrelevant, not reasonably calculated to lead to the discovery of relevant evidence, is not in proportion to the needs of the case, as intended to harass, and calls for privileged, confidential information.**

8. Provide a copy of each document relating to reimbursement of expenses requested by Marisa Jorge for calendar year 2016, 2017 and 2018.

materials in its possession that were in place from January 1, 2017 through October 1, 2017 at a date and time agreed upon by counsel.

24. Produce any documents addressed to the “undercover watchdog society” or any member of the “undercover watchdog society” that relate in any way to the operation at AFT Michigan, its affiliates, or the American Federation of Teachers and its affiliates.

**RESPONSE:**

Project Veritas objects to this request to the extent it does not identify the timeframe for which it is seeking such documentation. Moreover, Project Veritas objects to the extent that this request is vague, ambiguous, and undefined, specifically because it does not define what or who may constitute an “affiliate” of AFT Michigan or the American Federation of Teachers. Project Veritas interprets “undercover watchdog society” to mean monthly donors to the organization, who enroll through “The Undercover Watchdog Society.” Subject to these objections, Project Veritas will produce any responsive, non-privileged materials in its possession sent to The Undercover Watchdog Society that reference AFT Michigan from January 1, 2017 through October 1, 2017 at a date and time agreed upon by counsel.

25. Produce any copies of correspondence, whether electronic or paper,

2017 and December 31, 2017.

**RESPONSE:**

**Project Veritas will produce any responsive, non-privileged materials in its possession sent or received between January 1, 2017 and October 1, 2017 at a date and time agreed upon by counsel.**

28. Provide a copy of any correspondence, electronic or otherwise, to any person or entity who or which contributed money or anything of value to Project Veritas at any time which correspondence references, discusses, describes or otherwise touches upon AFT Michigan or the American Federation of Teachers.

**RESPONSE:**


**Project Veritas objects to this request to the extent it seeks information that is not relevant to any party's claims or defenses, is not in proportion to the needs of the case, is intended to harass, and is not reasonably calculated to lead to the discovery of relevant evidence, including, but not limited to, information pertaining to donor identification. To the extent this also seeks information from other Project Veritas investigations unrelated to AFT-Michigan, such information is protected by the First Amendment. Subject to these objections, to the extent any such responsive, non-privileged documents exist that are responsive to this request, Project Veritas will produce such documents sent or**

received between January 1, 2017 and October 1, 2017 at a date and time agreed upon by counsel, subject to the right to redact any donor information. If any such documents contain the names of Project Veritas journalists who played no role in the investigation of AFT Michigan, details of other investigations, or donor information, that information will be redacted as irrelevant to any party's claims or defenses and privileged under the First Amendment.

Submitted by Project Veritas, by its attorneys.

Objections by its attorneys:

**BUTZEL LONG, P.C.**

By:   
**Butzel Long, P.C.**  
Paul M. Mersino (P72179)  
150 W. Jefferson, Suite 100  
Detroit, MI 48226  
mersino@butzel.com  
313-225-7015

Stephen R. Klein (P74687)  
Statecraft PLLC  
1629 K St. NW Ste. 300  
Washington, DC 20006  
(202) 804-6676  
steve@statecraftlaw.com

Attorneys for Defendants

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